

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Claire C. Cecchi, U.S.D.J.
:
v. : Crim. No. 19-877
:
MATTHEW BRENT GOETTSCHKE, :
RUSS ALBERT MEDLIN, :
JOBADIAH SINCLAIR WEEKS :
JOSEPH FRANK ABEL, and :
SILVIU CATALIN BALACI :

Defendants. :

FOURTH FORFEITURE BILL OF PARTICULARS

The United States of America, by and through Philip R. Sellinger, United States Attorney for the District of New Jersey (Joseph N. Minish, Assistant U.S. Attorney, appearing), submits this Fourth Forfeiture Bill of Particulars, pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure, to restate, supplement, and clarify the forfeiture allegations contained in the Indictment, Crim. No. 19-877, and to provide notice to defendants Matthew Brent Goettsche and Russ Albert Medlin of specific property the Government intends to forfeit upon conviction.

1. The allegations set forth in the Indictment are realleged and incorporated herein by reference for the purpose of alleging forfeiture, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Property subject to forfeiture in this case to the United States, pursuant to Federal Rule of Criminal Procedure 32.2(a) and 18 U.S.C. §

981(a)(1)(C) and 28 U.S.C. § 2461(c), includes, but is not limited to the property listed in the schedule attached hereto as Exhibit A.

This notice does not limit the Government from seeking the forfeiture of additional specific property or limit the Government from seeking the imposition of a forfeiture money judgment.

Dated: Newark, New Jersey
November 9, 2022

Philip R. Sellinger
United States Attorney

By: s/ Joseph N. Minish
Joseph N. Minish
Assistant United States Attorney

EXHIBIT A

- a) Up to \$4,340,000 of the balance of JPMorgan Chase Bank, N.A. Asset Management account number [REDACTED] 2006 in the names of C [REDACTED] S [REDACTED] and E [REDACTED] S [REDACTED];
- b) Up to \$2,218,223 of the balance of US Bank account number [REDACTED] 2872 in the name of [REDACTED] Law Offices, PLLC; and
- c) Certain digital currency contained in Bitcoin addresses controlled by J [REDACTED] C [REDACTED], specifically,
[REDACTED] fhvD (up to 158.26 bitcoins),
[REDACTED] jwF1 (up to 54.67 bitcoins),
[REDACTED] GjAu (up to 488.66
bitcoins), and [REDACTED] 43AW (up to
1754.45 bitcoins).